

EXHIBIT 1

From: Alex Frawley <AFrawley@susmangodfrey.com>
Sent: Monday, August 15, 2022 4:54 PM
To: Stephen Broome; James Lee
Cc: Aly Olson
Subject: RE: Brown - to Google Stip.DOCX
Attachments: Brown - to Google Stip 8 pm.docx

[EXTERNAL EMAIL from afrawley@susmangodfrey.com]

Ok, how's this?

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From: Stephen Broome <stephenbroome@quinnemanuel.com>
Sent: Monday, August 15, 2022 6:44 PM
To: Alex Frawley <AFrawley@susmangodfrey.com>; James Lee <jwlee@bsfllp.com>
Cc: Aly Olson <alyolson@quinnemanuel.com>
Subject: Brown - to Google Stip.DOCX

EXTERNAL Email

Further revised per our call just now.

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE
 TRUJILLO, WILLIAM BYATT, JEREMY
 DAVIS, and CHRISTOPHER CASTILLO,
 individually and on behalf of all similarly
 situated,

Plaintiffs,

v.

GOOGLE LLC,
 Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]
 ORDER REGARDING BRIEFING
 SCHEDULE AND HEARING DATE FOR
 PLAINTIFFS' CLASS CERTIFICATION
 MOTION (DKT. 609) AND GOOGLE'S
 DAUBERT MOTIONS (DKTS. 662, 663,
 664)**

The Honorable Yvonne Gonzalez Rogers

Case No. 4:20-cv-03664-YGR-SVK

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING BRIEFING SCHEDULE AND HEARING
 DATE FOR PLAINTIFFS' CLASS CERTIFICATION MOTION AND PARTIES' DAUBERT MOTIONS

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on June 21, 2022, Plaintiffs filed their Motion for Class Certification (Dkt.
4 609);

5 WHEREAS, on August 5, 2022, Google filed its Opposition to Plaintiffs’ Motion for Class
6 Certification (Dkt. 665), as well as three *Daubert* motions (Dkts. 662, 663, 664);

7 WHEREAS, Plaintiffs’ oppositions to Google’s *Daubert* motions are currently due on
8 August 19, 2022;

9 WHEREAS, any replies in support of Google’s *Daubert* motions are currently due on
10 August 26, 2022;

11 WHEREAS, Plaintiffs’ Reply in support of their Motion for Class Certification is currently
12 due on August 26, 2022;

13 WHEREAS, the hearing on Plaintiffs’ motion for class certification as well as Google’s
14 *Daubert* motions is currently scheduled for September 20, 2022 at 2:00 p.m. (Dkt. 669);

15 WHEREAS, Google has requested an extension of its deadline for any replies in support of
16 its *Daubert* motions, from August 26 to September 1;

17 WHEREAS, Plaintiffs wish to ensure that any changes to the briefing schedules do not result
18 in any change to the September 20 hearing date;

19 WHEREAS, consistent with the current briefing schedules, Plaintiffs wish to maintain a
20 schedule whereby Google files any replies in support of its *Daubert* motions on the same day that
21 Plaintiffs file their Reply in support of their Motion for Class Certification (currently August 26);

22 WHEREAS, Google has agreed to reciprocally extend the deadline for Plaintiffs’ Reply in
23 support of their Motion for Class Certification from August 26 to September 1;

24 WHEREAS, Google has represented that it will not seek to reschedule the September 20
25 hearing date based on these stipulated changes to these briefing schedules;

26 WHEREAS, Plaintiffs have advised Google of their intention to file one *Daubert* motion on
27 August 19, following Plaintiffs’ depositions of Google’s experts that are occurring during the week
28 of August 15;

WHEREAS, in the interest of allowing this motion to be heard on September 20 during the currently scheduled hearing on Plaintiffs' class certification motion and Google's *Daubert* motions, the Parties have agreed to the following briefing schedule for Plaintiffs' *Daubert* Motion: Google's Opposition shall be due on September 9, and Plaintiffs' Reply shall be due on September 13;

NOW THEREFORE, the Parties stipulate to the following deadlines:

- The deadline for Google to file any replies in support of its *Daubert* motions (Dkts. 662-64) is extended from August 26, 2022 to September 1, 2022.
- The deadline for Plaintiffs to file their Reply in support of their Motion for Class Certification (Dkt. 609) is extended from August 26, 2022 to September 1, 2022.
- Plaintiffs shall file their *Daubert* Motion on August 19. Google's Opposition is due on September 9, and any reply is due on September 13. The hearing date for this motion shall be September 20, 2022.

DATED: August 30, 2022

QUINN EMANUEL URQUHART &
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/s/ TK Draft

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER. I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: August 30, 2022

By /s/ TK Draft
TK Draft
Counsel on behalf of Plaintiffs

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

- The deadline for Google to file any replies in support of its *Daubert* motions (Dkts. 662-64) is extended from August 26, 2022 to September 1, 2022.
- The deadline for Plaintiffs to file their Reply in support of their Motion for Class Certification (Dkt. 609) is extended from August 26, 2022 to September 1, 2022.
- Plaintiffs shall file their *Daubert* Motion on August 19. Google's Opposition is due on September 9, and any reply is due on September 13. The hearing date for this motion shall be September 20, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. YVONNE GONZALEZ ROGERS
United States District Judge